

**REMARKS**

**I. Status Of The Claims**

Claims 1-104 are pending in this Application.

Claim 21 is rejected under 35 U.S.C. 112, second paragraph.

Claims 1-104 are rejected under 35 U.S.C. 103(a) as being unpatentable over Alam (U.S. Patent No. 6,336,124).

Claims 1, 6, 11, 16, 21, 28, 35, 42, 49, 56, 63, 70, 77, 84, 91, and 98 are independent.

**II. Rejection Under 35 U.S.C. § 112**

The Office Action, with reference to “the phrase ‘potential page elements’”, rejects claim 21 under 35 U.S.C. 112, second paragraph.

Applicants respectfully disagree with the rejection at least in view of the disclosure of the present application stating:

“[t]he filter parses the converted data to determine as many attributes as is possible, such as, but not limited to, textual formatting (e.g., font, type size, color, indentation, and/or the like), page element geometries (if present), page element tags (if present), and/or the like 318. A parsed element will be made for each tag unearthed by the parsing”  
(see disclosure of the present application, p. 38 lines 6-10; emphasis added).

Additionally, Applicants respectfully submit that they do not believe “there [to be] insufficient antecedent basis” as indicated by the Office Action.

In view of at least the foregoing, Applicants respectfully request that the rejection under 35 U.S.C. 112 be withdrawn.

**III. Rejections Under 35 U.S.C. 103(a)**

The Office Action rejects independent claims 1, 6, 11, 16, 21, 28, 35, 42, 49, 56, 63, 70, 77, 84, 91, and 98 under 35 U.S.C. 103(a) as being unpatentable over Alam.

However, Applicants respectfully submit that Alam fails, for example, to disclose, teach, or suggest:

“... identifying transformation parameters for transforming target page elements based on the differences between the source device format type and target device format type ...”

as set forth in claims 21 and 35 (emphasis added), and as similarly set forth in each of claims 42, 56, 63, 77, 84, and 98.

The Office Action, apparently recognizing that such is not taught or disclosed by Alam, apparently contends that such is suggested among column 13 lines 10-54 of Alam via Alam’s discussion that:

“An output format block is generated for each block of the intermediate format at step 1204 ... Blocks in the intermediate format may be processed by process 1212 individually such that process 1212 is executed once for each intermediate format block, in multiple groups such that process 1212 is executed once for each group of intermediate format blocks, or all at once such that process 1212 is executed once for all the intermediate format blocks. After completion of all iterations of process 1212, an output RTF or HTML with style sheets format document is outputted at step 1210”  
(see Alam col. 13 ln. 15-34; emphasis added).

Applicants believe it clear that mere discussion that “[b]locks in the intermediate format may be processed” either “individually”, “in multiple groups”, or “all at once” is not at all suggestive, for instance, of:

“... identifying transformation parameters for transforming target page elements based on the differences between the source device format type and target device format type ...”

as set forth in claims 21 and 35 (emphasis added), and as similarly set forth in each of claims 42, 56, 63, 77, 84, and 98.

Applicants recognize that the Office Action apparently contends that Alam suggests employing the above-discussed “process[ing]” of “[b]locks in the intermediate format” “as a way to” identify “parameters for transforming” based on the differences between the source device format type and target device format type. However, in view of at least the foregoing, Applicants believe it clear that Alam provides no such disclosure, teaching, or suggestion.

As another example, Applicants submit that Alam fails to disclose, teach, or suggest:

“... transforming the page elements in the target document  
based on a transformation table ...”

as set forth in claim 1 (emphasis added), and as similarly set forth in each of claims 6, 11, and 16.

Applicants find no disclosure, teaching, or suggestion of such in the reference, and note that the Office Action apparently fails to identify any disclosure, teaching, or suggestion of such in the reference.

As a further example, Applicants respectfully submit that Alam fails to disclose, teach, or suggest:

“... generating source page elements with identifying source  
tags within the source device format document ...”

as set forth in each of claims 21 and 28 (emphasis added), and as similarly set forth in each of claims 42, 49, 63, 70, 84, and 91.

The Office Action contends that such is taught among column 7 lines 32-47 of Alam. However, Applicants respectfully observe that this portion of Alam fails to disclose, teach, or suggest such, and instead discusses merely that:

“Each tag may be associated with a specific portion of the document. Tags generally contain information about the specific portion such as identification as a heading, a table, a paragraph or a list and/or other information such as alignment, font, etc. Step 700 thus locates and stores the tags, if any, and the associated information contained therein. The tags may be complete or the tags may be incomplete tags and do not provide complete information about the specific portion of the document. The tags may be utilized to facilitate execution of subsequent steps, such as steps 702, 704, 706 and 708. If results of such subsequent steps conflict with the information contain in the tags, the results from the steps preferably supersede or replace the information in the tags. In other words, tags are preferably used as baseline or default results or settings. Alternatively, if the tags are complete, the process may bypass steps 702, 704, 706 and 708”

(see col. 7 ln. 32-47; emphasis added).

Applicants recognize that the Office Action apparently contends that Alam teaches “generating source page elements with identifying source tags” via discussion of “locat[ing] and stor[ing] the tags, if any, and the associated information contained therein”, and that Alan teaches “the source device format document” via discussion of an “intermediate format document”.

Applicants respectfully submit that Alam fails to so teach. However, even if Alam were taken to so teach for the sake of argument, Alam would still, for instance, fail to disclose, teach, or suggest “stor[ing] the tags, if any, and the associated information contained therein” within the “intermediate format document”.

In view of at least the foregoing, Applicants respectfully submit that claims 1, 6, 11, 16, 21, 28, 35, 42, 49, 56, 63, 70, 77, 84, 91, and 98, as well as those claims that depend therefrom, are in condition for allowance.

**IV. Dependent Claim Rejections**

Applicants do not believe it is necessary at this time to further address the rejections of the dependent claims as Applicants believe that the foregoing places the independent claims in condition for allowance. Applicants, however, reserve the right to further address those rejections in the future should such a response be deemed necessary and appropriate.

**CONCLUSION**

Applicants respectfully submit that this Application is in condition for allowance for which action is earnestly solicited.

If a telephone conference would facilitate prosecution of this Application in any way, the Examiner is invited to contact the undersigned at the number provided.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any fees which may be required for this submission, or credit any overpayment to Deposit Account No. 13-4500, Order No. 4301-4001. **A DUPLICATE OF THIS DOCUMENT IS ATTACHED.**

Furthermore, in the event that a further extension of time is required, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of

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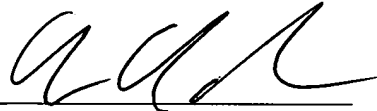
time or credit any overpayment for an extension of time to the above-noted Deposit Account and  
Order No.

Respectfully submitted,

MORGAN & FINNEGAN, L.L.P.

Dated: January 13, 2006

By:



Angus R. Gill  
Registration No. 51,133

**Mailing Address:**

MORGAN & FINNEGAN, L.L.P.  
3 World Financial Center  
New York, New York 10281-2101  
(212) 415-8746  
(212) 415-8701 (Fax)